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March 29, 2022

Via ECF

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Manetta, et al. v. Navient Corporation, et al.
Case No. 2:20-cv-07712-SWD-LDW

Dear Judge Wettre:

We represent Plaintiffs in the referenced matter. We respectfully write to provide the Court a status update as to discovery in advance of the April 4, 2022 conference.

Plaintiffs have provided full responses and production in response to Defendants' discovery requests.

On the other hand, despite tacitly admitting possession of much of the documents and information requested, Defendants have wholesale refused to provide documents and information responsive to the vast majority of Plaintiffs' requests, which are directed, per the Court's discovery orders, both to class and individual claim discovery. On February 18, 2022, Plaintiffs provided Defendants with a 20-page deficiency letter outlining the many deficiencies in Defendants' responses. On March 11, 2022 Defendants responded to the letter and on March 25, 2022 provided a small additional production; but, as can be seen by their letter of yesterday, Defendants still refuse to meaningfully respond to the vast majority of Plaintiffs' requests.

Counsel will meet and confer to discuss these deficiencies and hopefully resolve some of the disputed items in advance of the April 4 conference, but unfortunately given the nature of Defendants' response and their letter to the Court of yesterday, it appears that Court intervention will unfortunately ultimately be necessary. Plaintiffs will not, however, respond to the briefing in Defendants' "status" letter in this status letter but rather will make the appropriate application to the Court at the appropriate time pursuant to the Federal and Local Rules and Your Honors' instructions.

Moreover, Plaintiffs will make all efforts to be available for mutually-convenient depositions; however, given the scant nature of Defendants' responses to date Plaintiffs are not yet even able to identify the necessary Defendant witnesses, let alone depose them and thus

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Plaintiffs respectfully posit that Defendants' professed concern about a "final" deposition schedule is premature.

As always, we appreciate the Court's consideration of these matters.

Respectfully submitted,

James Van Splinter

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cc: All counsel of record via ECF